

**IN THE UNITED STATES DISTRICT COURT  
FOR THE STATE OF DELAWARE**

KERRY JOHNSON and  
SHARON ANDERSON,  
on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

GOVERNMENT EMPLOYEES  
INSURANCE COMPANY,  
GEICO CASUALTY COMPANY,  
GEICO GENERAL INSURANCE  
COMPANY, and GEICO INDEMNITY  
COMPANY,

Defendants.

C.A. No. 1:06-cv408 (JJF)

NON-ARBITRATION

TRIAL-BY JURY DEMANDED

CLASS ACTION

**STIPULATION OF SUPPLEMENT TO STIPULATED CONFIDENTIALITY ORDER**

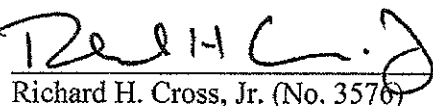
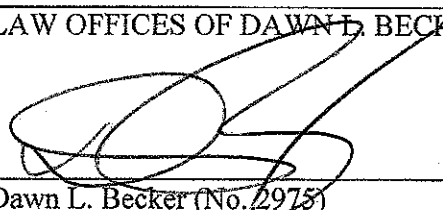
Plaintiffs and Defendants, by and through undersigned counsel, hereby stipulate and agree, subject to approval of the Court, that the Stipulated Confidential Order [Docket Entry No. 41], entered on December 4, 2007, shall be supplemented as follows:

It is hereby ordered that the following provision shall also govern claims of confidentiality in these proceedings:

- 1) In connection with discovery proceedings in this action and the parties' Stipulated Confidentiality Order, and as permitted by Delaware state and federal law, Defendants will produce, either as agreed between the parties or as directed by the Court, certain Delaware Personal Injury Protection ("PIP") claim files without redacting non-public personally identifiable information, but subject to applicable attorney/client and/or work product privileges. In conjunction therewith, concerning any non-public personally identifiable information that may be contained within the PIP claim files or any of the information and/or documents produced by Defendants in this action, Plaintiffs agree that they will not contact any purported class member, other than the named Plaintiffs in this action, unless and until a class is certified in this action; however, to the extent Plaintiffs identify other potential purported class members, if any, through other resources outside of this action, they are not barred from such contact. Plaintiffs also agree that Defendants

**STIPULATION OF SUPPLEMENT TO STIPULATED CONFIDENTIALITY ORDER**

may identify the information and documents produced from the PIP claim files as Confidential and Subject to the Protective Order entered in this action.

<p>CROSS &amp; SIMON, LLC</p>  <p>Richard H. Cross, Jr. (No. 3576) Christopher P. Simon (No. 3697) Kevin S. Mann (No. 4576) 913 North Market Street, 11<sup>th</sup> Floor P.O. Box 1380 Wilmington, Delaware 19899-1380 (302) 777-4200</p> <p><i>Attorneys for Plaintiffs</i></p>	<p>LAW OFFICES OF DAWN L. BECKER</p>  <p>Dawn L. Becker (No. 2975) Heather Long (No. 4910) Citizens Bank Center 919 Market Street, Suite 725 Wilmington, DE 19801 (302) 778-5784</p> <p><i>Attorneys for Defendants</i></p>
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SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2008

\_\_\_\_\_  
DATE

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The Honorable Joseph J. Farnan  
United States District Court for the District  
of Delaware

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